

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA	)	CASE NO. 1:16-cr-00329
	)	
Plaintiff	)	JUDGE SARA LIOI
	)	
VS.	)	<u>MOTION FOR MODIFICATION OF</u>
	)	<u>BOND CONDITIONS</u>
	)	
YAZAN B. AL-MADANI	)	
	)	
Defendants	)	

Now comes the defendant, Yazan B. Al-Madani, by and through his attorney, Richard J. Perez, and respectfully moves this Court for an Order modifying the condition of the defendant's bond that he have no contact with either current or former MetroHealth employees.

A number of the defendant's employees and co-workers were once employed by MetroHealth. In addition, each of the co-defendants are also prior employees of Metrohealth. It is necessary that the co-defendants be able to communicate with each other in meetings with their counsel in order to prepare their defense. Likewise, it is necessary for the defendants to communicate with their current employees, co-workers and each other as they all work together.

Assistant United States Attorneys, Om Kakani and Michael Collyer have no objection to this modification as long as the defendants do not discuss this case with the employees or co-workers who are currently employed by the defendants and who

RICHARD J. PEREZ, ATTORNEY AT LAW  
Interstate Square Building I, Suite 240, 4230 State Route 306, Willoughby, Ohio 44094  
(440)953-1310

are prior employees of MetroHealth (See Exhibit A).

In view of the foregoing, the defendant, Yazan B. Al-Madani, requests that the bond condition concerning contact with prior and current employees of MetroHealth be modified to permit contact with each of the co-defendants as well as the employees and co-workers of the defendants who previously were employed by MetroHealth.

Respectfully submitted,

/s/Richard J. Perez  
RICHARD J. PEREZ (0010216)  
Attorney for Defendant  
4230 State Route 306 Suite 240  
Willoughby OH 44094  
440-953-1310  
440-953-1427  
[rick@perezlaw.com](mailto:rick@perezlaw.com)

PROOF OF SERVICE

I hereby certify that on October 28, 2016 a copy of the foregoing was electronically filed with the Clerk of Courts, United States District Court for the Northern District of Ohio, Eastern Division, using the CM/ECF system which is to send notification of such filing to the appropriate counsel, including

Om M. Kakani  
James L. Morford  
Michael L. Collyer  
Assistant United States Attorney  
400 United States Courthouse  
801 West Superior Avenue  
Cleveland OH 44113

/s/Richard J. Perez  
RICHARD J. PEREZ (0010216)  
Attorney for Defendant

RICHARD J. PEREZ, ATTORNEY AT LAW  
Interstate Square Building I, Suite 240, 4230 State Route 306, Willoughby, Ohio 44094  
(440)953-1310